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Presentment Date: September 4, 2015 at 12:00 noon
Objection Date: September 1, 2015

Attorneys for Susan Andelman

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

SUSAN ANDELMAN,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04916

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF AN APPLICATION ON CONSENT
FOR AN ORDER TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a partner with Becker & Poliakoff LLP, counsel of record to Defendant Susan Andelman (the “BP Defendant”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Becker & Poliakoff LLP to withdraw as counsel to the BP Defendant; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. Counsel for the Trustee does not object to the relief requested herein.

3. The Trustee commenced this adversary proceeding against the BP Defendant on December 2, 2010 (the “Adversary Proceeding”).

4. After the Adversary Proceeding was commenced, the BP Defendant retained Becker & Poliakoff LLP to represent her herein.

5. On behalf of the BP Defendant in this Adversary Proceeding Peter W. Smith and I filed Notices of Appearance and Requests for Service of Papers on June 24, 2011. (ECF Doc. Nos. 7 and 8).

6. Differences have arisen between the BP Defendant and this firm which have made it impossible for us to continue to represent her.

7. Prior to making this application on August 3, 2015, I communicated with the BP Defendant’s husband Steven Andelman to confirm that I intended to make this application. I further informed him of the deadline to respond to the Trustee’s complaint in the Adversary Proceeding and he thereafter advised me that he and BP Defendant were retaining David Bernfeld, Esq. of Bernfeld, Dematteo, & Bernfeld.

8. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as BP Defendant’s counsel.

9. Accordingly, cause exists to grant the application authorizing Becker & Poliakoff LLP to withdraw as counsel for the BP Defendant.

Dated: August 28, 2015
New York, New York

/s/ Helen Davis Chaitman
